

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAAK, ATTILIO PO
and KARL LEIBINGER, on behalf of
themselves and those similarly situated,

Plaintiffs,

v.

DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 03-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS,
L.L.C., a Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10411 (PBS)

GARY B. FILLER and LAWRENCE
PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10477 (PBS)

JANET BAKER and JAMES BAKER,
JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING
CORP., SA),

Defendants.

Civil Action No.: 04-10501 (PBS)

**DEXIA BANK BELGIUM'S MOTION FOR A PROTECTIVE ORDER LIMITING THE
DEPOSITIONS OF BART FERRAND AND PETER RABAEGY TO TWO DAYS EACH**

Defendant Dexia Bank Belgium, by and through its counsel, hereby moves pursuant to Rule 26(c) of the Federal Rules of Civil Procedure for a protective order limiting the depositions of Bart Ferrand and Peter Rabaey to two days each.

In support of this motion, Dexia Bank Belgium submits the accompanying Memorandum of Law and the Declaration of Jeff E. Butler.

WHEREFORE, Dexia Bank Belgium requests that this motion for a protective order be granted in full.

CERTIFICATION

The undersigned counsel hereby certifies, pursuant to Local Rule 7.1(a)(2), that counsel for Dexia Bank Belgium and counsel for all Plaintiffs conferred in good faith regarding the length of the depositions in question and were unable to reach agreement.

Dated: September 13, 2006

Respectfully submitted,

MINTZ LEVIN COHN FERRIS GLOVSKY &
POPEO

By: /s/ Eóin P. Beirne
Peter M. Saparoff (BBO#441740)
Breton Leone-Quick (BBO#655571)
Eóin P. Beirne (BBO#660885)

One Financial Center
Boston, MA 02111
Tel: (617) 542-6000
Fax: (617) 542-2241

James B. Weidner
Jeff E. Butler
CLIFFORD CHANCE US LLP
31 West 52nd Street
New York, NY 10019-6131
Tel: (212) 878-8000
Fax: (212) 878-8375

Counsel for Dexia Bank Belgium